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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

11 IP SOLUTIONS, INC., ) Case No. 07-CV-02774 JF (RS)  
12 Plaintiff, )  
13 vs. )  
14 BANK OF AMERICA, N.A., *et al.*, )  
15 Defendants. )  
\_\_\_\_\_  
)

17 TO THE COURT, TO ALL PARTIES, AND TO THE PARTIES' ATTORNEYS  
18 OF RECORD:

19 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff, IP  
20  
21 SOLUTIONS, INC. (“Plaintiff”) and Defendants, BANK OF AMERICA, N.A. and BANK  
22 OF AMERICA TECHNOLOGY AND OPERATIONS, INC. (“Defendants”) that the Case  
23 Management Conference be continued for one month from its presently-scheduled date of  
24 January 25, 2008, up to and until February 29, 2008, or to a later date that is convenient for  
25 the Court.

1 IT IS FURTHER HEREBY STIPULATED AND AGREED by and between  
2 Plaintiff and Defendants that, pursuant to this Stipulation continuing the Case Management  
3 Conference that this Stipulation is requested for good cause, in that representatives of  
4 Plaintiff IP Solutions and Bank of America have conferred directly regarding settlement of  
5 this action, and Plaintiff is submitting comprehensive terms for a settlement on January 11,  
6 2008.

8 The following time modifications have been made in this case:

9 – the parties previously stipulated that Defendants be granted an additional fifteen  
10 (15) days in which to respond to Plaintiff's Complaint, up to July 27, 2007;  
11 – the parties further stipulated that Defendants be granted an additional four (4)  
12 days in which to respond to Plaintiff's Complaint, up to July 31, 2007;  
13 – the parties stipulated that the original case management conference be continued  
14 for two months, from its originally-scheduled date of August 29, 2007. The Court issued  
15 an Order granting that continuance on August 27, 2007;  
16 – the parties stipulated that the initial case management conference be continued for  
17 one month, and the Court granted that continuance on October 3, 2007, scheduling the case  
18 management conference for October 26, 2007. The Court then issued a Clerk's Notice  
19 rescheduling the conference for December 7, 2007;  
20 – the parties stipulated to continue their Rule 26(f) conference, up to December 21,  
21 2007. On December 4, 2007, the Court issued an order granting that Stipulation and  
22 continuing the case management conference to January 25, 2008.  
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Because the parties filed their Joint Case Management Statement on November 30, 2007, granting this Stipulation and Order to continue the case management conference will have no other effect on the schedule for this case.

By entering into this stipulation, neither Plaintiff nor Defendants waive any rights, claims or defenses they may have in this action. This Stipulation may be executed in counterparts and by facsimile signature, each of which, when executed, shall be an original and all of which together shall constitute one and the same stipulation. This Stipulation contains the entire agreement among the parties. The undersigned hereby consent to the terms set forth in the foregoing Stipulation.

IT IS SO STIPULATED AND AGREED.

Dated: 1/9/2008

TRIAL & TECHNOLOGY LAW GROUP  
A Professional Corporation  
Attorneys for Plaintiff  
IP SOLUTIONS, INC.

/s/ Robert A. Spanner  
By: \_\_\_\_\_  
Robert A. Spanner

Dated: 1/9/2008

**FISH & RICHARDSON, P.C.**  
Attorneys for Defendants  
**BANK OF AMERICA, N.A. and BANK OF  
AMERICA TECHNOLOGY AND OPERATIONS,  
INC.**

/s/ Christina D. Jordan  
By: \_\_\_\_\_  
Christina D. Jordan

## DECLARATION OF CONSENT

Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Christina D. Jordan.

Dated: 1/9/2008

TRIAL & TECHNOLOGY LAW GROUP  
A Professional Corporation  
Attorneys for Plaintiff  
IP SOLUTIONS, INC.

By: \_\_\_\_\_ /s/ Robert A. Spanner  
Robert A. Spanner

## ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 1/17/08

HONORABLE JEREMY FOGL JUDGE OF THE  
UNITED STATES DISTRICT COURT